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Mr. Sam Borries  
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Subject:

Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site  
Plainwell No. 2 Dam Area Time-Critical Removal Action  
Monthly Report (May 2010)

Dear Sam:

Attached is the 11<sup>th</sup> monthly progress report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Plainwell No. 2 Dam Area Time-Critical Removal Action (TCRA). This progress report is submitted in accordance with Paragraph 19a of the June 2009 Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action (Docket No. V-W-09-C-925). On August 5, 2009, the United States Environmental Protection Agency (USEPA) determined that future updates on the Former Plainwell Impoundment TCRA project will be included in this monthly report. Per the August 6, 2009 direction of the USEPA, monthly reports will only be submitted electronically.

If you have any questions, please do not hesitate to contact me.

Sincerely,

ARCADIS



Stephen Garbaciak Jr., P.E.  
Vice President

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Leslie Kirby-Miles, USEPA  
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June 15, 2010

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**MONTHLY REPORT FOR THE ALLIED PAPER, INC./PORTAGE CREEK/  
KALAMAZOO RIVER SUPERFUND SITE  
PLAINWELL NO. 2 DAM AREA TIME-CRITICAL REMOVAL ACTION**

**REPORT #11, MAY 2010**

**PREPARED BY ARCADIS  
JUNE 15, 2010  
ON BEHALF OF GEORGIA-PACIFIC LLC**

**SUBMITTED TO**

**SAM BORRIES, ON-SCENE COORDINATOR  
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Monthly Report for the Allied Paper, Inc./Portage Creek/  
Kalamazoo River Superfund Site  
Plainwell No. 2 Dam Area TCRA**

**REPORT #11, MAY 2010**

**Significant Developments and Activities During the Period**

- On May 3, ARCADIS and Michigan Department of Natural Resources and Environment (MDNRE) discussed a press release concerning river closure during the 2010 construction season.
- On May 5, MDNRE issued a press release titled *Kalamazoo River to Close to Public for Final Cleanup Activities*.
- On May 6, USEPA hosted a Site update meeting in Kalamazoo, Michigan, which included 2010 cleanup activities planned for the Plainwell No. 2 Dam Area.
- On May 7, Georgia-Pacific, ARCADIS, MDNRE, United States Environmental Protection Agency (USEPA) and associated subcontractors participated in the 2010 Plainwell No. 2 Dam Area Kickoff Meeting in Plainwell, Michigan.
- On May 14, ARCADIS submitted to USEPA the 10<sup>th</sup> *Monthly Report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Plainwell No. 2 Dam Area TCRA* for April 2010.
- On May 14, ARCADIS submitted to USEPA copies of the planned locations and coordinates for post-excavation confirmation sampling grids.

**Data Collected and Field Activities Conducted During the Period**

- During the week of May 3, ARCADIS continued mobilizing equipment to the south side of the river, continued to construct staging areas and access roads, and began installation of trees and shrubs on the north side of the river as a part of final restoration activities.
- During the week of May 10, ARCADIS continued mobilizing equipment to the south side of the river, continued constructing staging areas and access roads, continued stump removal, and began installation of the bridge to Island 2. A sample of 1"x3" crushed concrete (TS10082) was collected and submitted to TestAmerica Laboratories, Inc. (TAL) for polychlorinated biphenyl (PCB), target compound list (TCL) volatile organic compound (VOC), TCL semi-volatile organic compound (SVOC), TCL pesticide, Resource Conservation and Recovery Act (RCRA) metals, diesel range organic (DRO), and gasoline range organic (GRO) analysis. Table A summarizes the samples collected.

**Monthly Report for the Allied Paper, Inc./Portage Creek/  
Kalamazoo River Superfund Site  
Plainwell No. 2 Dam Area TCRA**

**REPORT #11, MAY 2010**

- During the week of May 17, ARCADIS continued mobilizing equipment to the south side of the river, continued constructing staging areas and access roads, continued stump removal, began clearing and grubbing activities on Island 2, continued installation of trees and shrubs on the north side of the river as a part of final restoration activities, and completed installation of the bridge to Island 2.
- During the week of May 24, ARCADIS continued mobilizing equipment to the south side of the river, continued constructing staging areas and access roads, continued stump removal, continued clearing and grubbing activities on Island 2, and completed restoration activities at the former staging area and access roads on the north side of the river. One PCB wipe sample (VT-63) was collected from the vacuum truck used to remove spent carbon from the water treatment system. A five-part post-construction composite sample (TS10083) was collected from the four corners and center of Staging Area 3. It was collected from the same locations as sample TS10035 (collected in August 2009). Seventeen post-construction samples (TS10084 through TS10087 and TS10089 through TS10101) and one duplicate sample (TS10088) were collected from the access roads from Riverview Drive to Staging Area 3 and from Staging Area 3 to the river. These samples were collected from the same locations as pre-construction samples TS10026 through TS10047 (collected in August 2009). All samples were submitted for PCB analysis and will be compared to pre-construction PCB concentration. Table A summarizes the samples collected.
- No activities were performed on May 31.

**Laboratory Data Received During the Period**

- During the week of May 17, ARCADIS received analytical data for crushed concrete sample TS10082 from TAL.
- During the week of May 24, ARCADIS received analytical data for PCB wipe sample VT-63 from KAR Laboratories, Inc.
- ARCADIS is awaiting analytical data for post-construction soil samples TS10083 through TS10101.

**Issues Encountered and Actions Taken**

- None

**Monthly Report for the Allied Paper, Inc./Portage Creek/  
Kalamazoo River Superfund Site  
Plainwell No. 2 Dam Area TCRA**

**REPORT #11, MAY 2010**

**Developments Anticipated During the Next Reporting Period**

- During the week of June 1, ARCADIS is scheduled to complete construction of Staging Areas 1 and 2, clearing and grubbing on the south side of the river, and installation of access roads on the south side of the river.
- During the week of June 7, ARCADIS is scheduled to install resuspension controls and begin excavation activities on Island 2.
- During the week of June 14, ARCADIS is scheduled to continue excavation activities on Island 2.
- During the week of June 21, ARCADIS is scheduled to complete excavation activities on Island 2 and begin backfilling and grading of Island 2.
- During the week of June 28, ARCADIS is scheduled to complete backfilling and grading, remove resuspension controls, begin preliminary restoration activities (installation of topsoil, seed, and erosion control blanket), and begin access road removal on Island 2.
- In June, ARCADIS will continue submitting copies of analytical data from Plainwell No. 2 Dam Area TCRA sampling activities to USEPA.

**Updates to the Former Plainwell Impoundment TCRA**

- During the week of May 3, ARCADIS installed topsoil on the access roads removed near Staging Area 3.
- On May 6, ARCADIS and Georgia-Pacific participated with USEPA and MDNRE in a Lessons Learned meeting for the Plainwell TCRA project.
- During the week of May 17, ARCADIS performed the annual inspection of restored banks, as described in Section 5.6 of the *Final Former Plainwell Impoundment TCRA Design Report*.

**Developments Anticipated During the Next Reporting Period from the Former Plainwell Impoundment TCRA**

- In June, ARCADIS is scheduled to submit a report detailing the results of the May 2010 inspection of restored banks, as described in Section 5.6 of the *Final Former Plainwell Impoundment TCRA Design Report*.

**Georgia-Pacific LLC**  
**Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site**  
**Plainwell No. 2 Dam Area TCRA**  
**Monthly Report #11, May 2010**

**Table A — Summary of Samples Collected and Data Received in May 2010**

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result (mg/kg)	PCB Action Limit	Response Action / Notes
Property Access Soil Samples									
TS10083	05.25.10	NR	NR	TAL	Staging Area 3 post-construction 5-part composite, same locations as TS10035 (Steele-Thompson property)	PCBs	-	-	-
TS10084					Access road along river, same location as TS10044 (Steele property)	PCBs	-	-	-
TS10085					Access road along river, same location as TS10045 (Steele property)	PCBs	-	-	-
TS10086					Access road along river, same location as TS10046 (Steele property)	PCBs	-	-	-
TS10087					Access road along river, same location as TS10047 (Steele property)	PCBs	-	-	-
[TS10088]						[PCBs]	[-]	[-]	[-]
TS10089					Access road from Staging Area 3 to river, same location as TS10041 (Winkle property)	PCBs	-	-	-
TS10090					Access road from Staging Area 3 to river, same location as TS10040 (Winkle property)	PCBs	-	-	-
TS10091					Access road from Staging Area 3 to river, same location as TS10039 (Winkle property)	PCBs	-	-	-
TS10092					Access road from Staging Area 3 to river, same location as TS10038 (Winkle property)	PCBs	-	-	-
TS10093					Removed access road from Staging Area 3 to the railroad crossing, same location as TS10034 (Steele-Thompson property)	PCBs	-	-	-
TS10094					Removed access road from Staging Area 3 to the railroad crossing, same location as TS10033 (Steele-Thompson property)	PCBs	-	-	-
TS10095					Removed access road from Staging Area 3 to the railroad crossing, same location as TS10032 (Steele-Thompson property)	PCBs	-	-	-
TS10096					Removed access road from Staging Area 3 to the railroad crossing, same location as TS10031 (Steele-Thompson property)	PCBs	-	-	-
TS10097					Removed access road from Staging Area 3 to the railroad crossing, same location as TS10030 (Steele-Thompson property)	PCBs	-	-	-
TS10098					Access road from the railroad crossing to Riverview Drive, same location as TS10029 (Steele property)	PCBs	-	-	-
TS10099					Access road from the railroad crossing to Riverview Drive, same location as TS10028 (Steele property)	PCBs	-	-	-
TS10100					Access road from the railroad crossing to Riverview Drive, same location as TS10027 (Steele property)	PCBs	-	-	-
TS10101	Access road from the railroad crossing to Riverview Drive, same location as TS10026 (Steele property)	PCBs	-	-	-				
Fill Material Sampling									
TS10082	05.11.10	05.20.10	KAL545	TAL	9-part composite sample from 1"x3" crushed concrete source	PCBs, TCL VOCs, TCL SVOCs, RCRA Metals, TCL Pesticides, DROs, and GROs	0.019 U	4 mg/kg	None <sup>1</sup>
PCB Wipe Samples									
VT-63	05.24.10	05.25.10	101996	KAR	Wipe samples from vacuum truck used to remove carbon from the water treatment system	PCBs	0.2 µg per 100 cm2 U	10 µg per 100 cm2 <sup>2</sup>	None

**Notes:**

- 1 - Analytical results compared to applicable Part 201 cleanup criteria and Part 213 RBSLs provided in MDNRE's RRD Operational Memorandum No. 1 (Table 2, Column #19, Direct Contact Criteria & RBSLs).  
2 - The decontamination standard for non-porous materials previously in contact with PCB-containing liquid according to Federal Regulations (Title 40, Chapter 1, Subchapter R, Part 761.79.3).

- \* Duplicate samples are shown in brackets.  
\* Analytical results have not been validated.

DROs - diesel range organics  
GROs - gasoline range organics  
KAR - KAR Laboratories, Inc.  
MDNRE - Michigan Department of Natural Resources and Environment  
mg/kg - milligrams per kilogram  
PCBs - polychlorinated biphenyls  
RBSL - Risk Based Screening Level  
RCRA - Resource Conservation and Recovery Act

RRD - Remediation & Redevelopment Division  
SVOCs - semivolatile organic compounds  
TAL - TestAmerica Laboratories, Inc.  
TCL - target compound list  
U - Compound analyzed but not detected at a concentration above the reporting limit  
µg per 100 cm<sup>2</sup> - microgram per 100 square centimeters  
VOCs - volatile organic compounds